

BAY AREA AIRQUALITY

MANAGEMENT

DISTRICT

SINCE 1955

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October 26, 2010

Martha Aja City Manager's Office 100 Civic Plaza Dublin, CA 94568

Subject: Draft Dublin Climate Action Plan

Dear Martha Aja:

Bay Area Air Quality Management District (District) staff submitted a comment letter (dated August 5, 2010) on the City of Dublin's Draft Climate Action Plan (CAP) and Draft Negative Declaration. In the letter, the District identified a number of instances in which it appeared that the CAP was inconsistent with the District's 2010 CEQA Guidelines. Subsequently, District staff has met with City of Dublin staff and gained a better understanding of the City's work in developing the CAP, and of the methods used in calculating greenhouse gas (GHG) emissions.

A discussion of significant clarifications gained through communications with City staff follows.

## **Baseline GHG Emissions Inventory**

The District's earlier comment letter identified several emission sources that appeared to have been excluded from the baseline GHG inventory. City staff have clarified that GHG emissions associated with industrial activities, direct access energy use, and electricity use associated with water conveyance were embedded in data for other sectors in the baseline inventory. A subsequent version of the CAP (October 2010) identifies and discusses emissions from these sources.

## **Reduction Target**

The July version of the CAP included a goal of reducing GHG emissions 25% below 2020 business-as-usual levels. As this methodology and target was inconsistent with the District's CEQA Guidelines, City staff has decided to use the District's plan level threshold of 6.6 metric tons per service population. District staff agrees this is a more appropriate target.

## **GHG Emissions Forecast**

The District's earlier comment letter stated that it was unclear if the City was including in its CAP GHG reductions from policies or actions that had taken place



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The District commends the City for undertaking the CAP process. The District appreciates the flexibility and openness with which City staff has addressed the issues raised in our earlier comment letter. The City has clearly made a significant commitment to climate protection, through the draft Climate Action Plan and the many climate-friendly policies and programs it has implemented to date. The District looks forward to working with the City of Dublin as it moves forward with implementing the Climate Action Plan and other climate protection strategies. District staff is available to assist the City staff in addressing these comments and otherwise assist with developing and implementing the CAP. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,

Jean Roggenkamp

Deputy Air Pollution Control Officer

cc: BAAQMD Vice-Chairperson Tom Bates

BAAQMD Director Scott Haggerty

BAAQMD Director Jennifer Hosterman

**BAAQMD** Director Nate Miley